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December 30, 2024

Via ECF

Hon. Lewis J. Liman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Freeman et al. v. Giuliani, 24-cv-06563(LJL): 24-mc-00353-(LJL)

Dear Judge Liman:

As you are aware, this office represents Defendant Rudolph W. Giuliani (“Defendant”) in these two actions listed above. Defendant respectfully submits that Defendant Giuliani intends to rely upon, and wishes for the Court to consider, his following submissions at the hearing scheduled for January 3, 2025, on Plaintiffs’ motion to hold Defendant in contempt and enter sanctions, alleging that Defendant failed to comply with discovery orders.

In docket no. 24-cv-6563, Defendant will rely upon and seek for the Court to consider these entries: ECF No. 143, 165, and 167. In docket no. 24-mc-353, Defendant will rely upon and seek for the Court to consider these entries: ECF No. 179, 202, and 204.

Defendant Giuliani may rely on and ask the Court to consider all materials filed on both dockets and deposition transcripts of: (1) Defendant; (2) Andrew Giuliani; (3) non-party witness

Alan Placa; (4) non-party witness Theodore Goodman; (5) non-party witness Dr. Maria Ryan; and (6) non-party-witness Ryan Medrano. We look forward to appearing in Court on January 3, 2025, and wish the Court a happy and healthy New Year.

Respectfully Submitted,



Joseph M. Cammarata